

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

OSIEL SALAZAR BALDERAS §  
§ CIVIL ACTION NO. 4:24-CV-03422  
§  
§ JURY DEMANDED  
VS.  
STOP N DRIVE, LLC D/B/A TRIANGLE  
MARKET

## **DEFENDANT'S ORIGINAL ANSWER**

TO THE HONORABLE JUDGE AND JURY OF SAID COURT:

COMES NOW DEFENDANT, Stop N Drive LLC d/b/a Triangle Market, who in answer to Plaintiff's Original Complaint would show the following:

1. Defendant denies that it ever employed Osiel Salazar Balderas.
  2. Denied.
  3. Denied.
  4. Admitted.
  5. Admitted.
  6. Admitted.
  7. Admitted.
  8. Admitted.
  9. Denied.
  10. Denied.
  11. Denied.
  12. Denied.

13. Denied.
14. Denied.
15. Denied.
16. Admitted.
17. Admitted.
18. By way of affirmative defense, Defendant would show that it sold the store

On Sept. 30, 2022 to ZNK Ventures LLC.

**PRAYER FOR RELIEF**

WHEREFORE Defendant requests that it be dismissed with all costs taxed against Plaintiff.

Respectfully submitted,

/s/Lennon C. Wright  
Lennon C. Wright  
lennon@lennonwright.com  
SBN: 22048600 FBN: 3098  
924 E. 25<sup>th</sup> Street  
Houston, Texas 77009  
713/654-7878 Telephone  
713/869-3223 Facsimile

ATTORNEY FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that I served a true and correct copy of this Original Answer on all counsel of record on October 15, 2024. pursuant to the F.R.C. P.

/s/Lennon C. Wright  
Lennon C. Wright